IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

TRAVIS THORN, Individually and on Behalf of All Others Similarly Situated

PLAINTIFF

VS.

No. 4:22-cv-3208-SL

PETECO INTERNATIONAL, LLC

DEFENDANT

UNOPPOSED MOTION TO WITHDRAW—JOSH SANFORD

Attorney Josh Sanford, an attorney of record herein, for his Motion to Withdraw as counsel for Plaintiff, states as follows:

- Colby Qualls, an attorney of record herein, resigned from Sanford Law Firm,
 PLLC, and is now affiliated with the law firm of Forester Haynie, PLLC.
- As noted in Mr. Qualls' Notice of Change of Law Firm Affiliation (ECF No.
 he will remain as counsel of record on behalf of Plaintiff.
- 3. Due to Mr. Qualls' move to Forester Haynie, PLLC, and his continuing representation of Plaintiff, and pursuant to Local Rule 83.2, Josh Sanford of Sanford Law Firm, PLLC, moves to withdraw as counsel for Plaintiff.
- 4. This request is not being sought for the purpose of delay and will not prejudice either party.

WHEREFORE, premises considered, the undersigned respectfully requests that the Court order Josh Sanford withdrawn and terminated as counsel for Plaintiff.

Respectfully submitted,

ATTORNEY JOSH SANFORD

SANFORD LAW FIRM, PLLC Kirkpatrick Plaza 10800 Financial Centre Pkwy, Suite 510 Little Rock, Arkansas 72211 Telephone: (800) 615-4946 Facsimile: (888) 787-2040

/s/ Josh Sanford
Josh Sanford
Tex. Bar No. 24077858
josh@sanfordlawfirm.com

CERTIFICATE OF CONFERENCE

I, the undersigned counsel, do hereby certify that counsel for Plaintiff communicated with Defendant's counsel about whether Defendant would oppose this Motion. Per Defendant's counsel, this Motion is **unopposed**.

/s/ Josh Sanford Josh Sanford

CERTIFICATE OF SERVICE

I, the undersigned counsel, do hereby certify that on the date imprinted by the CM/ECF system, a copy of the foregoing MOTION was filed via the CM/ECF system, which will provide notice to the following attorneys of record:

Colby Qualls, Esq.
FORESTER HAYNIE, PLLC
400 North Saint Paul Street, Suite 700
Dallas, Texas 75201
Telephone: (214) 210-2100
cqualls@foresterhaynie.com

Nolan Klein, Esq. LAW OFFICES OF NOLAN KLEIN, P.A. 5550 Glades Road, Suite 500 Boca Raton, FL 33431 PH: (954) 745-0588 klein@nklegal.com

> <u>/s/ Josh Sanford</u> Josh Sanford